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May 14, 2014

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**VIA CERTIFIED MAIL**

National Freedom of Information Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460

RE: Freedom of Information Act Request

Dear National FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I am requesting access to and copying of any and all documents that meet the following criteria, which are specified below.

We request information, including, but not limited to, documents in the possession of EPA, EPA's Office of Enforcement and Compliance Assistance, including, but not limited to the Air Enforcement Division and the National Enforcement Investigations Center, and the EPA's Office of Air Quality, Planning and Standards, including, but not limited to data evaluated at Research Triangle Park and EPA regional labs and information under the control of EPA through its contractors.

At the outset, and as you may know, President Obama has issued an executive memorandum instructing all federal agencies to adopt a presumption of disclosure when administering requests under FOIA:

All agencies should adopt a presumption in favor of disclosure, in order to renew their commitment to the principles embodied in FOIA, and to usher in a new era of open Government. The presumption of disclosure should be applied to all decisions involving FOIA. (Memorandum from President Obama to the Heads of Executive Departments and Agencies regarding the Freedom of Information Act [2009]).

Accordingly, we understand that EPA will administer this FOIA request in compliance with the President's memorandum.

**REQUESTED RECORDS**

1. Any and all documents relating to any investigation or monitoring conducted by the United States Environmental Protection Agency's National Enforcement Investigation Center ("NEIC") of the Wood River Refinery located in Roxana, Illinois.
2. Any and all documents relating to any actions taken by the United States Environmental Protection Agency as a result of any investigation or monitoring conducted by NEIC at the Wood River Refinery in Roxana, Illinois.
3. Any and all documents relating to Shell Oil Company's fugitive emissions leak detection program, including any document received from, or sent to, Shell Oil Company regarding Shell Oil Company's leak detection and repair program relating to actions taken by Shell Oil Company at its Wood River Refinery located in Roxana, Illinois to comply with the Clean Air Act's Leak Detection and Repair Rule ("LDAR") to control fugitive emission leaks. See e.g. 40 C.F.R. Part 60.
4. Any information provided to the United States House of Representatives' Minority Staff Special Investigations Division Committee on Government Reform with respect to preparation of the November 10, 1999 report titled "Oil Refineries Fail to Report Millions of Pounds of Harmful Emissions," which was prepared for Rep. Henry A. Waxman, including, but not limited to, any correspondence to or from Shell Oil Company or any investigation conducted by NEIC.
5. Letter from Steven A. Herman, EPA Assistant Administrator to Rep. Henry A. Waxman (June 29, 1999).

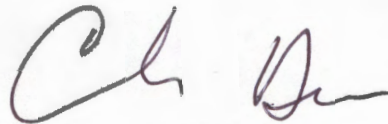
Please supply the requested records without informing me of the cost of the fees if the fees do not exceed two hundred fifty dollars and no cents (\$250.00), which I agree to pay. If the fees exceed \$250.00, please inform me of the fee amount prior to processing my request. Please provide the requested records in electronic format, if possible.

Your response is required within twenty (20) business days. If any document is not provided, please describe the document and the FOIA exemption that you believe applies.

Please call me if you have any questions as to specificity, which may ease your review and search for the requested information. Thank you for your assistance.

Very truly yours,

THE DYSART LAW FIRM, P.C.

A handwritten signature in dark ink, appearing to read 'Ch. Dysart', is written over the printed name.

Christopher W. Dysart

CWD/smb

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